

# **Adobe & Student Privacy**

Learn how Adobe complies with laws, regulations and best practices related to the privacy of student data.

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Adobe products, apps, and services help students communicate their ideas in more creative and engaging ways — so they can make the world take notice. As schools and universities around the globe are confronted with an ever-expanding array of privacy laws, however, it can be challenging for schools to determine whether Adobe solutions comply with local student privacy requirements.

This page is designed to help you understand – in plain language – the student privacy commitments we make to you, which may vary based on how you deploy Adobe solutions in your school or university. We also answer some of the most common student privacy questions we receive in the U.S., the EU, and elsewhere.

## One Adobe. Multiple ways to deploy.

The identity solution you choose makes all the difference. Adobe offerings can be deployed on one of three types of identity solutions: (1) a general consumer ID (which we call an Adobe ID), (2) an Enterprise ID, or (3) a Federated ID.





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# Primary & Secondary Schools (K-12) or Higher Education

### **Higher Education Only**

#### **Account Type**

Enterprise or Federated IDs.
School claims their domain and assigns licenses to named students using Adobe's admin console tool. Learn more.

Adobe ID. Learn more.

#### **Relevant Legal Terms**

Schools sign up for Enterprise or Federated IDs directly with Adobe and agree to the relevant Adobe license terms including, where applicable, the K-12 (Primary and Secondary) Education Additional Terms. Users sign up for an Adobe ID directly with Adobe and agree to the Adobe Terms of Use and Privacy Policy.

#### **Account Control**

With Enterprise or Federated IDs, the account(s) and content are controlled by the school – not by Adobe. Adobe provides the Adobe Student Services on the school's behalf.

Any student data gathered is for the use and benefit of the school With Adobe IDs, the account and content are controlled by the user – not by Adobe.







has licensed.

# FERPA (Family Educational Rights and Privacy Act)

Where Enterprise or Federated IDs are deployed, Adobe contractually agrees to act as a "school official" for FERPA purposes, consistent with 34 Code of Federal Regulations (CFR) §99.31(a)(1) and to protect student data accordingly.

Where an Adobe ID is deployed, Adobe cannot agree to act as a "school official" for FERPA purposes as our user agreement is with the individual user, not with the school, and the use of the Adobe products and services are governed by our Terms of Use and Privacy Policy.

However, these users receive protections similar to those outlined in FERPA (i.e., Adobe provides commercially reasonable security and will not share personal data except at the user's direction or as outlined in our Privacy Policy).

# Age Restrictions, Parental Consent and COPPA Compliance (Children's Online Privacy Protection Act)

Enterprise or Federated IDs are appropriate for use by individuals of any age. To the extent that a school determines consent from a student's parent or legal guardian is required, Adobe relies on the school to obtain such consent.

Adobe IDs are appropriate for use by individuals over the local age of consent (which may vary by location).

#### Safe Search

Internet image search and Adobe
Stock are turned off in Adobe

Users can use Adobe ID on all Adobe hosted services, including



## GDPR / Account Data Access, Correction and Deletion Requests

Subject to the school's acceptance of the Data Processing Agreement, Adobe is the Data Processor and the school is the Controller for GDPR purposes. As a Data Processor for the school, Adobe gives schools the tools they need to promptly respond to account data access, correction and deletion requests submitted to them by students or their parents. Schools are empowered to access, correct and delete accounts and stored content.

Learn more about Adobe's GDPR readiness.

Adobe will respond to data access, correction and deletion requests about Adobe ID user account information made by an authenticated user within the time period required by statute.

Adobe ID users can self-access and delete their own stored content.

Learn more about Adobe's GDPR readiness.

# Access to Account and Data After Graduation

Enterprise and Federated ID accounts and their content are controlled by the school.

However, Adobe is developing workflows to enable schools to easily authorize the transfer of content from a school-provided Enterprise or Federated ID account to a personal Adobe ID account established by the student creator. Stay tuned!

The Adobe ID account and its content are controlled by the user and remain in their control after they graduate or leave a school. No need to do anything extra.







Adobe or on Adobe's behalf. When we do this, it is subject to contractual restrictions protecting the security and confidentiality of this data, or as otherwise permitted by our agreement with the school. Adobe does not sell student data to third parties.

Adobe works with third party companies that help us run our business. These companies provide services such as delivering customer support, processing credit card payments, and sending emails on our behalf. In some cases, these companies have access to some of an Adobe ID user's personal information in order to provide services to that user on our behalf. These companies are not permitted to use this information for their own purposes.

#### Marketing

Adobe does not market to student users with Enterprise or Federated IDs or use student data to inform our marketing or advertising activities.

Depending on local law, Adobe may market to Adobe ID users or use user data to inform our marketing and advertising activities, consistent with notice and choice requirements. Learn more.

## **Ad Targeting and Student Personal Information**

Adobe does not use student personal information to target advertising.

Adobe uses Adobe ID user information for targeted advertising in the manner described in our Priv

**Analytics and Machine Learning** Adobe may perform analytics

Depending on local law, Adobe





analyze and improve the student services, consistent with the terms of our agreement with the school.

requirements. Learn more.

Any student data gathered is for the use and benefit of the school and used for no other commercial purpose other than operating or improving the products and services the school has licensed.

## Security

Adobe provides reasonable administrative, technical, and physical security controls to protect the schools' and students' personal information and content. Learn more about our security program and commitments.

Adobe provides reasonable administrative, technical, and physical security controls to protect the user's personal information and content. Learn more about our security program and commitments.

#### **Breach Notification**

Adobe will notify schools deploying Enterprise or Federated IDs in accordance with the relevant breach notification law and our agreement with the school.

Adobe will notify Adobe ID users in accordance with the relevant breach notification law.

